Commonwealth of Kentucky
Division for Air Quality

PERMIT STATEMENT OF BASIS

Swedish Match
1121 Industrial Drive, Owensboro, Kentucky.
August 11, 2004
Herbert Campbell, Reviewer
Plant I.D. # 21-059-00092
Application Log # 53916/F535
Permit #: V-04-026

SOURCE DESCRIPTION:
The company manufactures tobacco. The tobacco is dried and a powder is metered on it. It's then dried again before being conditioned with steam and destemmed. Equipment in the process includes 3 natural gas-fired boilers, 7 driers, 3 ordering cylinders, powder dressing operation, stemmery and a strip line cylinder.

EMISSION UNITS:
E. Unit 01 Three boilers for steam heat to the tobacco dryers and heating, primary fuel natural gas with secondary fuel No. 2 fuel oil and installed before 1971.

E. Unit 02 Wolverine Jetzone Dryer used to dry smoking and chewing tobacco after it has been cased. Installed before 1982.

E. Unit 03 Procter Dryer #1 apron dryer to dry tobacco. Installed before 1972.

E. Unit 04 Procter Dryer #2 apron dryer to dry tobacco. Installed before 1973.

E. Unit 05 Griffin Dryer rotary steam dryer to dry cased tobacco. Installed before 1991 with dust collector for tobacco fines.

E. Unit 06 Two Wolverine Jetzone belt dryers to dry cased tobacco. Installed before 1977 with cyclone for tobacco fines.

E. Unit 07 Powder Dressing Preparation and Application, a dry powder is metered onto tobacco for flavoring. Installed before 1973 with fabric filter.

E. Unit 08 Two ordering cylinders to condition tobacco. Installed before1972.

E. Unit 09 Stemmery (Stemming lines A and B, Strip line) for destemming tobacco. Installed A line before 1972, B line before 1980 and strip line before 1995. Equipped with dust collectors.

E. Unit 10 Carmen dryer, a vibrating fluid bed dryer, used to dry strip tobacco. Installed before 1995. Equipped with dust collector for tobacco fines.

E. Unit 11 Strip line cylinder conditions strip tobacco with steam and/or water in a rotating cylinder. Installed before 1995.

REGULATION APPLICABILITY:

Emission Unit 01 401 KAR 61:015 Existing indirect heat exchanger, for units less than 250 mmBtu/hr commenced before April 9, 1972.

Emission Unit 02 401 KAR 59:010 New process operations, applicable to an emission unit that commenced after July 1975.

Emission Unit 03 401 KAR 61:020 Existing process operation, applicable to a process operation commenced before July 2, 1975.

Emission Unit 04 401 KAR 61:020 Existing process operation, applicable to a process operation commenced before July 2, 1975.

Emission Unit 05 401 KAR 59:010 New process operations, applicable to an emission unit that commenced after July 1975.

Emission Unit 06 401 KAR 59:010 New process operations, applicable to an emission unit that commenced after July 1975.

Emission Unit 07 401 KAR 61:020 Existing process operation, applicable to a process operation commenced before July 2, 1975.

Emission Unit 08 401 KAR 61:020 Existing process operation, applicable to a process operation commenced before July 2, 1975.

Emission Unit 09 401 KAR 59:010 New process operations, applicable to an emission unit that commenced after July 1975.

Emission Unit 10 401 KAR 59:010 New process operations, applicable to an emission unit that commenced after July 1975.

Emission Unit 11 401 KAR 59:010 New process operations, applicable to an emission unit that commenced after July 1975.

COMMENTS:

The application is for an existing major source for an initial source wide operating permit. The permittee may ensure compliance with the emissions limitations and standards conditioned within the permit for Emissions Unit 01 by performing the calculations based upon sulfur content, fuel usage and processing rates, and emission factor information.

The permittee has not proposed any alternate operating scenario for any of the emissions units.

The permittee is required to monitor processing and production rates and hours of operation due to the emissions potential of each designated unit.

EMISSIONS AND OPERATING CAP DESCRIPTION:
Compliance with annual emissions and processing limitations imposed pursuant to Cabinet Provisions and Procedures for Issuing Title V Permits, Section 1c of the material incorporated by reference in 401 KAR 52:020, Section 5(8)b, and contained in this permit, shall be based on emissions and processing rates for any twelve (12) consecutive months. The source has the potential to be a major source for PM, NO_x and SO_2 emissions. The NO_x and SO_2 emissions are due to the ability to use fuel oil as the boiler fuel throughout the year.

CREDIBLE EVIDENCE:
This permit contains provisions which require that specific test methods, monitoring or record-keeping be used as a demonstration of compliance with permit limits. On February 24, 1997, the U.S. EPA promulgated revisions to the following federal regulations: 40 CFR Part 51, Sec. 51.212; 40 CFR Part 52, Sec. 52.12; 40 CFR Part 52, Sec. 52.30; 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12, that allow the use of credible evidence to establish compliance with applicable requirements. At the issuance of this permit, Kentucky has not incorporated these provisions in its air quality regulations.